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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 JANELLE C. JAMES,
15 Defendant.
16

Case No. 2:20-cr-00218-RFB-EJY

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**
(Expedited Treatment Requested)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Andrew Duncan,
18 Assistant United States Attorney, counsel for the United States of America, and Joanne L.
19 Diamond, Assistant Federal Public Defender, counsel for Janelle James, that the Court modify
20 her conditions of release.

21 The Stipulation is entered into for the following reasons:

- 22 1. On January 8, 2021, the Court ordered Ms. James' release on a personal
23 recognizance bond with certain conditions, including a travel restriction to the State of Nevada.
24 ECF No. 24 at 3.
- 25 2. Ms. James' closest family members live in Coleville, California. Coleville is an
26 approximately 10 to 15-minute drive across the Nevada state line into California. Ms. James

1 just learned that her brother committed suicide yesterday. She would like to travel to Coleville
2 to be with her family and to make occasional trips to visit her family going forward.

3 3. Counsel has spoken with Pretrial Services concerning this issue. Pretrial
4 Services confirmed that Ms. James has been compliant with the terms of her release and has no
5 opposition to her traveling to California at this time and making occasional trips to visit her
6 family going forward. Pretrial Services requests this Court issue an order allowing Ms. James
7 to travel to California at the discretion of Pretrial Services.

8 4. The government has no objection to this requested modification.

9 DATED this 1st day of July 2021.

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11 RENE L. VALLADARES
12 Federal Public Defender

Christopher Chiou
Acting United States Attorney

13 By /s/ Joanne L. Diamond
14 JOANNE L. DIAMOND
15 Assistant Federal Public Defender

By /s/ Andrew Duncan
ANDREW DUNCAN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 v.

7 JANELLE C. JAMES,
8

9 Defendant.

Case No. 2:20-cr-00218-RFB-EJY

ORDER

10 IT IS THEREFORE ORDERED that Ms. James' conditions of release be modified to
11 allow for Ms. James to travel to Coleville, California, at the discretion of Pretrial Services.

12 DATED this 2nd day of July, 2021.

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15 RICHARD F. BOULWARE, II
16 UNITED STATES DISTRICT JUDGE
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